

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION,

This Document Relates to:

Jaylynn Dean v. Uber Technologies, Inc., et al., No. 3:23-cv-06708

Case No. 3:23-md-03084-CRB

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF
DEFENDANTS' TRIAL MOTION TO
EXCLUDE COMPANY-CULTURE
EVIDENCE**

Judge: Hon. Charles R. Breyer
Courtroom: Courtroom 6 – 17th Floor

Trial Date: January 13, 2026

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
PHOENIX DIVISION**

JAYLYNN DEAN,
Plaintiff,
v. UBER TECHNOLOGIES, INC., et al.,
Defendants

CASE NO. 25-cv-4276-PHX-CRB

Judge: Hon. Charles R. Breyer
Courtroom: 501

DECLARATION OF LAURA VARTAIN HORN

I, Laura Vartain Horn, declare as follows:

3 1. I am an attorney at law and duly licensed to practice before the U.S. District Court
4 for the Northern District of California, and am admitted to practice *pro hac vice* before this Court
5 in the U.S. District Court of Arizona. I am a partner at the law firm of Kirkland & Ellis LLP and
6 an attorney of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC
7 (collectively, “Uber” or “Defendants”). I have personal knowledge of the facts set forth in this
8 Declaration and, if called to testify as a witness, could and would do so under oath.

9 2. I submit this declaration in support of Defendants' Trial Motion to Exclude
10 Company-Culture Evidence in *Jaylynn Dean v. Uber Technologies Inc., et al.*, N.D. Cal. No. 23-
11 md-03084; D. Ariz. No. 25-cv-4276.

12 3. Attached to this Declaration as **Exhibit 1** is a true and correct copy of Trial Exhibit
13 P-01858, identified as Exhibit 1347 at the July 3, 2025 deposition of Travis Kalanick.

14 4. Attached to this Declaration as **Exhibit 2** is a true and correct copy of pages 183 to
15 188 of the deposition of Travis Kalanick, taken on July 3, 2025.

16 5. Attached to this Declaration as **Exhibit 3** is a true and correct copy of Trial Exhibit
17 P-01856, identified as Exhibit 1345 at the July 3, 2025 deposition of Travis Kalanick.

18 6. Attached to this Declaration as **Exhibit 4** is a true and correct copy of pages 175 to
19 176 of the deposition of Travis Kalanick, taken on July 3, 2025.

20 7. Attached to this Declaration as **Exhibit 5** is a true and correct copy of pages 305 to
21 311 of the deposition of Travis Kalanick, taken on July 3, 2025.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on January
23 11, 2026.

/s/ *Laura Vartain Horn*
Laura Vartain Horn